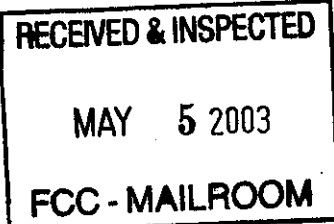


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Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW
TW-A325
Washington, D. C. 20554

Re:MB Docket No. 03-58
RM-10608

Dear Sirs;

Please find enclosed an original and four copies of the comments of Jerry E. White, Cindy Mitchell White, Donald E. White and Donald F. White D/B/A Mitchell County Television in the above listed rulemaking.

Should you have any questions, please contact us as listed below.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerry E. White".

Jerry E. White
Managing Partner
2586 Old Pelham Road
Pelham, GA 31779
229-294-1909
whitefam@rose.net

ENCLOSURE rec'd 04

RECEIVED & INSPECTED
MAY 5 2003
FCC - MAILROOM

AFFIDAVIT

State of Georgia

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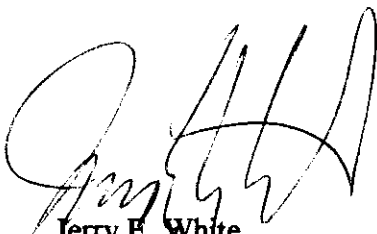
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Mitchell County

Jerry E. White being first duly sworn, deposes and says that he is the Managing Partner of Mitchell County Television permittee of WQLI(FM) Pelham, Georgia. That he has prepared the comments attached hereto and believe said comments to be true and correct to the best of his knowledge.



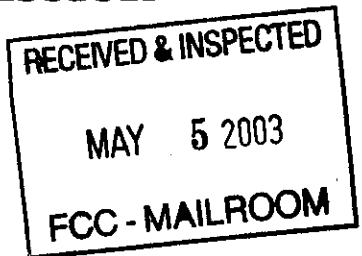
Jerry E. White
Affiant

Subscribed and sworn to before me this 1st day of May, 2003.



Cindy Mitchell White
Notary Public
My Commission Expires May 21, 2004

Before The
Federal Communications Commission
Washington, DC 20554



In the Matter of

Amendment of Section 73.202(b)
FM Table of Allotments,
FM Broadcast Stations
(Pelham and Meigs, Georgia)

}
}
} MB Docket No. 03-58
} RM-10608
}
}
}

COMMENTS

The Audio Division has before it a petition for rule making filed by Jerry E. White, Cindy Mitchell White, Donald E. White, and Donald F. White D/B/A Mitchell County Television ("Mitchell") proposing the re-allotment of Channel 222A from Pelham, Georgia to Meigs, Georgia, and has issued a Notice of Proposed Rulemaking. Mitchell is the permittee of Station WQLI (FM), Channel 222A, Pelham, Georgia. Currently the station is not on the air, but Mitchell plans to have the station broadcasting by the July 19, 2003 deadline in its current construction permit BPH-19931105MA. In Mitchell's petition it was stated that WQLI (FM) will place a city grade signal over Pelham and Meigs when operational in the current construction permit. Since filing the petition Mitchell has filed an application to modify the WQLI (FM) construction permit. The modification was needed to locate the WQLI (FM) transmitter on a site that will meet local zoning ordinances that were put into place after Mitchell filed the original application. The new proposed site in modification application BMPH-200318AAH will also cover Pelham and Meigs with a city grade signal. Attached as exhibit "A" is a coverage map of WQLI (FM) at the modified site showing Pelham and Meigs and the proposed city grade signal.

Donald E. White, partner, has lived most of his life just outside the city limits of Meigs. While living outside the corporate city limits, Mr. White has had a Meigs, Georgia mailing address and a Meigs phone number. Mr. White has banked in Meigs and conducted other various business activities in Meigs during his lifetime. Mr. White has a long time business relationship with the city of Meigs. In fact in travels when asked where he is from, while not living within the corporate city limits, Mr. White is "from Meigs."

Jerry E. White, partner, and Donald F. White, partner, are sons of Donald E. White and have much of the same relationships with the city of Meigs. Jerry and Donald F. White graduated from high school in Meigs. Meigs no longer has a School.

Mitchell gave serious consideration to requesting the allotment of channel 222A to Meigs in the original rulemaking petition in 1993. Mitchell opted to request Pelham because we felt the larger city would help in the rulemaking comment period incase of a counter-proposal that would have 222A going to another area or precluding channel 222A from the Pelham-Meigs area. Mitchell also felt that channel 222A allotted to Meigs would attract applicants that would locate in the south part of the usable area to build a Thomasville, Georgia station.

U. S. Census Bureau numbers show that Meigs has a larger percentage of its population that is of a minority race than Pelham. Meigs is 66.8% Black, Pelham is 41.7%. While Census figures show Pelham leading Meigs with Hispanic or Latino population 15.2% to 2.8%, Mitchell believes the Meigs' Hispanic population is severely under-reported. The under-reporting of Hispanic or Latino population is a nation

wide problem for the Census Bureau. Local antidotal evidence is that Meigs has one of the largest Hispanic or Latino populations in the southwest Georgia area with a large agricultural labor pool residing in and around Meigs. This population is largely unregistered voters, mobile and we believe, under counted in the 2000 Census. Mitchell believes it would be in the public interest to have a radio station focus on the daily problems of the minority residents and the Hispanic or Latino laborers in the area with its public affairs programming. Mitchell has always had plans for some Hispanic or Latino programming in its public affairs schedule.

Median household income in Meigs is \$16,993, Pelham is \$20,040. Poverty in Meigs would again be a source of public affairs programming in Meigs.

Pelham is located totally within Mitchell County, and while it is not the county seat it is about the same size as its sister city, Camilla, Georgia. Camilla is 9 Miles north of Pelham and is the county seat of Mitchell County. The economic lives of Pelham and Camilla are connected. Meigs is located in the Northwest corner of Thomas County, and in fact part of the incorporated city limits is in Mitchell County. Meigs is set apart from the main business district of the county and the county seat by about 21 miles. Many of the problems of Pelham that could be covered by public affairs programming of a radio station would be similar for both Pelham and Camilla and are most likely be covered by the public affairs programming of WQVE (FM) Camilla, Georgia.

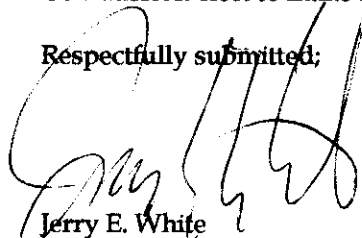
Meigs is a city that had a thriving business district in "the good 'ole days." As late as the 1980's Meigs was filled with empty buildings. Recently, buildings have been remodeled and some removed for green spaces. Mitchell believes the psychological affect of having a radio station identify with the community cannot be under estimated. While not on the same level as opening a hospital or healthcare center, having a radio station assigned to the community will give the image that the city is truly open for business.

Mitchell knows, as we are sure the Commission does, that a commercial radio station in rural Southwest Georgia cannot program just to one community. Mitchell has always planned to serve Pelham, Meigs, and Camilla within its city grade signal and other cities such as Baconton, north of Camilla, and Cairo, to our south, should receive service from the station. Mitchell believes that the city of license should be the subject and beneficiary of a radio station's serious public affairs programming and we believe that Meigs would benefit most from such attention.

As a result of the foregoing Mitchell requests that the Commission adopt the proposed rulemaking and reallocate channel 222A from Pelham, Georgia to Meigs, Georgia.

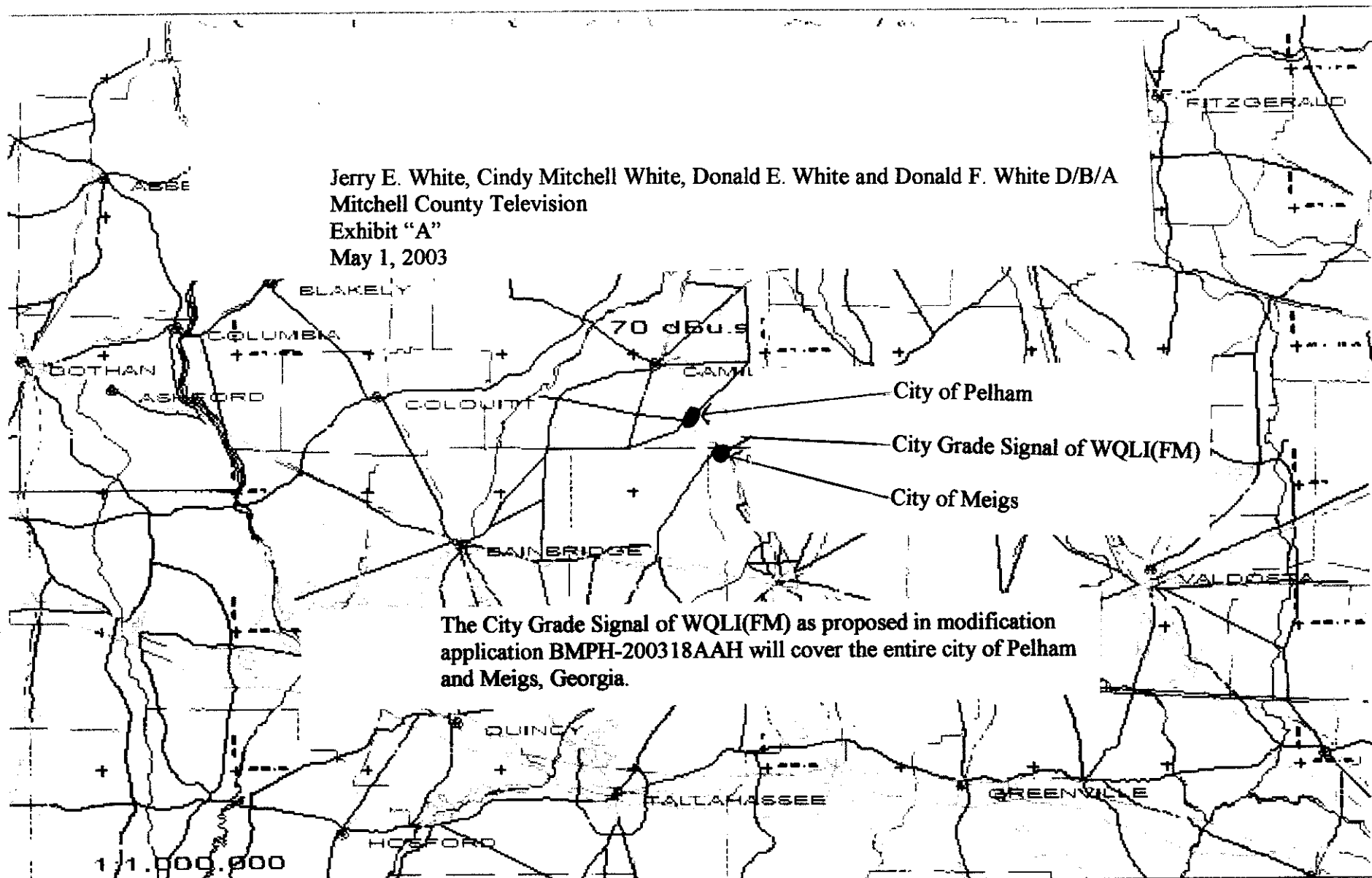
Mitchell believes the change can be accomplished by amending the WQLI (FM) construction permit in the report and order, however, Mitchell will promptly file whatever application may be needed should the Commission elect to make the reallocation.

Respectfully submitted;



Jerry E. White
Managing Partner
Mitchell County Television
WQLI (FM)

Jerry E. White, Cindy Mitchell White, Donald E. White and Donald F. White D/B/A
 Mitchell County Television
 Exhibit "A"
 May 1, 2003



Scale in km	WQLI.C 222A 6kW 175.35M AM	WQLI.C
10 20 30 40 50 60 70	N. Lat. 31 05 12 W. Lng. 84 12 10	- 02/03

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State of Georgia

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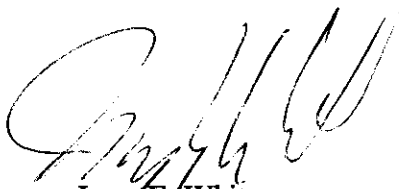
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Mitchell County

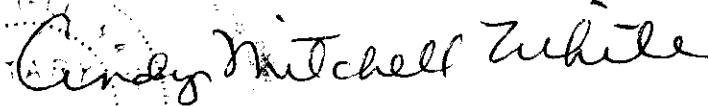
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Jerry E. White
Affiant

Subscribed and sworn to before me this 1st day of May, 2003.


Cindy Mitchell White
Notary Public
My Commission Expires May 21, 2004